

Application No. 09/657,430
Amendment dated October 12, 2004
Reply to Office Action of July 12, 2004

REMARKS

Claims 1-22 were pending in the application; the status of the claims is as follows:

Claims 1-5, 11-15, 21, and 22 are rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,170,953 B1 to Lee et al (“Lee”).

Claims 6, 9, 10, 16, 19, and 20 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Lee in view of U.S. Patent No. 6,190,172 B1 to Lechner (“Lechner”).

Claims 7, 8, 17, and 18 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Lee in view of Lechner as applied to claims 1 and 11 above, and in view of U.S. Patent No. 6,377,230 B1 to Yamazaki et al (“Yamazaki et al”).

Claims 23 and 24 have been added.

Claims 1 and 11 have been amended to more clearly point out the subject matter of the invention. Claims 4, 5, 14, and 15 have been cancelled. New claims 23 and 24 have been added to address additional features of the invention. These changes do not introduce any new matter.

35 U.S.C. § 102(e) Rejection

The rejection of claims 1-5, 11-15, 21, and 22 under 35 U.S.C. § 102(e) as being anticipated by Lee, is respectfully traversed because the cited reference fails to disclose all elements of the rejected claims.

The Lee patent discloses a laser video projector for projecting an identical image to a plurality of screens. The color components of a white laser beam are modulated by the colors of the image while the laser beam is deflected vertically and horizontally in a manner analogous to a CRT raster scan. The scanning laser beam thus paints an image on the screens. A multi-screen projecting optical system projects the image so that it is

spread across multiple screens. This is done by creating a mismatch between the image scan line rate and the horizontal scan rate of the projecting optical system. For example, if the speed of the polygonal mirror is reduced by half, alternating image scan lines are displayed side by side. As a result, the left and right halves of an image are displayed on left and right screens, respectively.

However, Lee silent as to using the multiple screens to form the walls of an observation room for housing an observer. It appears to be alleged at page 3 of the Office Action, that Lee inherently discloses inner wall faces of an observation room. However, the fact that a certain result or characteristic may occur or be present in the prior art is not sufficient to establish the inherency of that result or characteristic; rather, it must be shown that the allegedly inherent characteristic necessarily flows from the teachings of the applied prior art. MPEP 2112, emphasis in the original. It is respectfully submitted that Lee does not inherently disclose that the screens form interior walls of an observation room. For example, the multiple screen could be put on the exterior of a building for the display of large advertisements as Lee suggest. Because Lee does not necessarily require the screens to form the interior walls of an observation room, Lee does not inherently disclose the same. Therefore, Lee fails to disclose “at least two screens onto which images are projected, the at least two screens forming inner wall faces of an observation room for housing an observer;” as required by claim 1. Therefore, claim 1 distinguishes over Lee.

Moreover, Lee also fails to disclose a projection optical system wherein the optical paths from the display device to each of its corresponding displays are approximately equal. Lee does not discuss the lengths of the various optical paths of the projection system. However, Fig. 3 appears to show that the optical path lengths to screens 1 and 2 differ from one another. Accordingly, Lee fails to disclose “at least one projection optical system . . . wherein each optical path from a display device to its corresponding screens has substantially the same length,” as required by claim 1. Therefore, claim 1 further distinguishes over Lee.

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Regarding to claims 2-3, these claims depend from claim 1 and therefore distinguish Lee for at least the same reasons as provided in respect of claim 1.

Regarding claims 4 and 5, these claims have been cancelled, rendering the rejections thereof moot.

Regarding claim 11, it is respectfully submitted that as applied above in respect of claim 1, Lee fails to disclose “installing at least two screens . . . wherein the screens form inner wall faces of an observation room for housing an observer,” or “installing at least one projection optical system . . . wherein optical paths from the at least one display device through the projection optical system to the at least two screens have substantially the same length.” Accordingly, claim 11 distinguishes over Lee.

Regarding claims 12 and 13, these claims depend from claim 11 and therefore distinguish Lee for at least the same reasons as provided in respect of claim 11.

Regarding claims 14 and 15, these claims have been cancelled, rendering the rejections thereof moot.

Regarding claims 21 and 22, these claims depend, respectively, from claims 1 and 11 and ,therefore, distinguish over Lee for at least the same reasons as their respective base classes.

Accordingly, it is respectfully requested that the rejection of claims 1-5, 11-15, 21, and 22 under 35 U.S.C. § 102(e) as being anticipated by Lee, be reconsidered and withdrawn.

35 U.S.C. § 103(a) Rejections

The rejection of claims 6, 9, 10, 16, 19, and 20 under 35 U.S.C. § 103(a), as being unpatentable over Lee in view of Lechner, is respectfully traversed because the

combination is improper, and because the combination fails to teach or suggest all elements of the rejected claims.

If, a proposed modification or combination of the prior art would change the principle of operation of the prior art invention being modified, then the teachings of the references are not sufficient to render the claims *prima facie* obvious. MPEP 2143.01. Lee teaches using a single laser beam to paint in a raster-scan fashion a single image across multiple display screens so as to create a large image suitable for outdoor advertising. Column 1, lines 46-50. Lechner teaches a display system, such as for a flight simulator, that projects images onto a plurality of screens disposed around a user of the flight simulator, wherein at least one CRT or transmissive LCD-type projection system is associate with each screen. *See* Figs. 1 and 2; and column 6, line 65 to column 7, line 5. The references use entirely different technologies to display large images. Lee uses a scanning laser, whereas Lechner uses CRT or LCD projectors; Lee uses one projector per screen, whereas Lechner uses at least one projector per display. It is respectfully submitted, therefore, that the references may not be combined without altering the principles of operation of at least one of the references. Accordingly, there cannot be any motivation to make the proposed combination and the combination is improper.

Moreover, assuming *arguendo* that it were proper, the proposed combination still fails to teach or suggest the limitations of the rejected claims. For example, neither reference teaches that the optical paths from a projector to the at least two screens are approximately the same. Lee does not discuss the optical path lengths, but Fig. 3 shows that screens 1 and 2 have different optical path lengths. Lechner also does not describe the optical path lengths of the disclosed system, but Fig 8. shows screens, *e.g.*, the front and side screens, at different distances from their corresponding projectors. Therefore, the combination fails to teach or suggest a “projection optical system . . . wherein optical paths from the at least one display device to the at least two screens have the same length,” required by claims 1 and 11, and by claims 6, 9, 10, 16, 19, and 20 which depend therefrom.

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Accordingly, it is respectfully requested that the rejection of claims 6, 9, 10, 16, 19, and 20 under 35 U.S.C. § 103(a) as being unpatentable over Lee in view of Lechner, be reconsidered and withdrawn.

The rejection of claims 7, 8, 17, and 18 under 35 U.S.C. § 103(a), as being unpatentable over Lee in view of Lechner as applied to claims 1 and 11 above, and in view of Yamazaki et al, is respectfully traversed based on the following.

As discussed herein above, the combination of Lee and Lechner fails to teach or suggest the elements of claims 1 and 11. Yamazaki teaches a system for displaying multiple images on a screen wherein different viewer may see different images. It is respectfully submitted that Yamazaki fails to provide any teaching that would make up for the deficiencies of the combination of Lee and Lechner. Therefore, claims 1 and 11 also distinguish over the combination of Lee, Lechner and Yamazaki, as do claims 7-8 and 17-18 which depend therefrom.

Accordingly, it is respectfully requested that the rejection of claims 7, 8, 17, and 18 under 35 U.S.C. § 103(a) as being unpatentable over Lee in view of Lechner as applied to claims 1 and 11 above, and in view of Yamazaki et al, be reconsidered and withdrawn.

CONCLUSION

Wherefore, in view of the foregoing amendments and remarks, this application is considered to be in condition for allowance, and an early reconsideration and a Notice of Allowance are earnestly solicited.

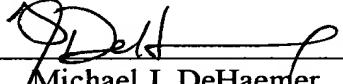
This Amendment does not increase the number of independent claims, does not increase the total number of claims, and does not present any multiple dependency claims. Accordingly, no fee based on the number or type of claims is currently due. However, if a fee, other than the issue fee, is due, please charge this fee to Sidley Austin Brown & Wood LLP's Deposit Account No. 18-1260.

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If an extension of time is required to enable this document to be timely filed and there is no separate Petition for Extension of Time filed herewith, this document is to be construed as also constituting a Petition for Extension of Time Under 37 C.F.R. § 1.136(a) for a period of time sufficient to enable this document to be timely filed.

Any other fee required for such Petition for Extension of Time and any other fee required by this document pursuant to 37 C.F.R. §§ 1.16 and 1.17, other than the issue fee, and not submitted herewith should be charged to Sidley Austin Brown & Wood LLP's Deposit Account No. 18-1260. Any refund should be credited to the same account.

Respectfully submitted,

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